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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**PG&E'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO ORDER RE
QUESTION RE PROBATION
CONDITIONS**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) hereby moves for a
2 five-day extension of the deadline to respond to this Court’s order entered on December 20,
3 2019, entitled “Question re Probation Conditions” (Doc. 1129) (the “Order”). The current
4 deadline is Friday, January 10, 2020, at noon. PG&E respectfully requests that the Court extend
5 the response deadline by five days to Wednesday, January 15, 2020, at noon. The United States
6 was consulted regarding this request and does not object to the five-day extension. As grounds
7 in support of this Motion, PG&E states as follows:

8 The Court’s Order requires PG&E to file a statement regarding, among other
9 issues, whether PG&E is in full compliance with the specific targets and metrics set forth in the
10 wildfire mitigation plan it submitted to the California Public Utilities Commission (“CPUC”), as
11 approved by the CPUC. Similarly, on January 15, 2020, PG&E is required to provide an update
12 to the CPUC showing progress through December 31, 2019 as to each commitment in its wildfire
13 mitigation plan. Along with stating whether each commitment is on track, PG&E’s submission
14 to the CPUC must include a narrative explanation of each status as well as an explanation of any
15 commitment that is not on track. PG&E’s response to the CPUC will substantially overlap with
16 its response to this Court’s Order. To enable PG&E to coordinate its responses to this Court and
17 to the CPUC, PG&E respectfully requests this Court extend the deadline for filing a response to
18 this Court’s Order for five days from January 10, 2020, to January 15, 2020.
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21 A proposed order is attached as Exhibit A for the Court’s consideration.
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1 Dated: December 24, 2019

Respectfully Submitted,

2 JENNER & BLOCK LLP

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4 By: /s/ Reid J. Schar
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